

## REMARKS

In light of the Final Rejection dated August 10, 2007, reconsideration of the present application is respectfully requested in view of the remarks presented herein supplementing the amendment filed on October 30, 2007 with a Request for Continuing Examination.

Bridges et al. does not disclose a “means for receiving a message that includes a first list including a plurality of network identifiers that are available for a potential handover, from the communication network” as recited in Claim 29 of this invention, as described below.

The mobile station disclosed in Bridges et al. receives a control channel by scanning the specific frequency set (home band). Furthermore, the mobile station disclosed in Bridges et al. compares the SID included in the received control channel with the SID (home SID) of home service provider, and determines whether or not the self position is being used in the home system based on the result of the above comparison. That is, the SID included in the received control channel specified service provider corresponds to the frequency set (band) which transmitted the control channel. At this point, in one market area, one frequency set (band) is assigned to one service provider (See: col. 2, lines 33-35), and an individual SID is assigned to each service provider (See: col.3, lines 8-12).

Therefore, each control channel transmitted by each frequency set (band), includes only one SID that corresponds to one service provider, and this service provider corresponds to the frequency set (band). This point is the same as in cases where a plural of security identifiers (SID) is used in a market (this is equal to a plurality of service providers that provides services in one market are) as disclosed in col.13, lines 34-50 of Bridges et al. That is, in the case where a plurality of security identifiers (SID) are used in a market, each SID is assigned to one service provider (See: col.3, lines 8-12), and one frequency set (band) is assigned to one service

provider. Thus, each control channel transmitted by each frequency set (band), includes only one SID that corresponds to one service provider, and this service provider corresponds to the frequency set (band).

However, “a message”, recited in claim 29 of this invention, includes a plurality of network ID (“a plurality of network identifiers”). So even if, for the purpose of discussion, a “control channel” of Bridges et al. were equated with “a message”, the Bridges et al. “control channel” would include only one SID. Therefore, the Bridges et al. control channel is different from “a message that includes a first list including a plurality of network identifiers” which includes a plurality of network ID recited in Claim 29.

Furthermore, SID that are included in the control channel of Bridges correspond to frequency set (band) used for transmitting the control channel, as described above, and this SID is not a network ID which is available for a potential hand over. That means the SID included in the control channel of Bridges is different from “a plurality of network identifiers that are available for a potential handover” as recited in Claim 29.

Additionally, the Examiner realized that PSL/IRDB of Bridges is equal to “a first list” mentioned in Claim 29 of this invention, but PSL/IRDB is maintained in a mobile station and PSL/IRDB is not received by the mobile station. Specifically, the mobile station disclosed in Bridges et al. compares the received single identity against the plurality of identities maintained on the mobile station. Consequently, the mobile station of Bridges et al. does not compare a received list containing a plurality of network identifiers against a second list, which includes at least one network identifier, and is stored on the user equipment to identify at least one network for handover, as recited in Applicant’s Claim 28, and similarly recited in Claim 29.

Referring to the disclosure in col. 12, lines 66 – 67 and col. 13, 34 – 38 of Bridges et al., these passages do not disclose Applicant's claimed message that includes a first list including a plurality of network identifiers. The cited passages disclose that in situations where multiple service providers exist in a given area, the PSL/IRDB stored on a mobile station may comprise a table of multiple SIDs and/or SOC's and their corresponding frequency bands. (See: Bridges et al.: col. 11 – 15 and col. 25 – 29). Thus, this list is equivalent to Applicant's second list that is stored in the mobile station, because no disclosure is provided in Bridges et al. that the table is a received list.

Instead, Bridges et al. discloses that each service provider sends its own network identifier. Therefore, the user equipment in Bridges et al. receives each network identifier individually, not as a list as recited in Applicant's Claims 28, 29 and 32.

In addition, the process of selecting the most appropriate system for a region, as disclosed in col. 12, lines 1 – 6 of Bridges et al., is not a comparison. A selection can be made using a multitude of methods none of which involve comparing. Therefore, simply citing a passage in Bridges et al. that discloses selecting would not be suggestive of performing a comparison to one of ordinary skill in the art.

Moreover, the Examiner seems to suggest that since Bridges et al. discloses a preferred system identification list (PSL) from which the most appropriate system is selected by the mobile station, the unselected/unused systems are equivalent to Applicant's claimed at least one network identifier in the second list being an identifier of a network that is not to be used. This reading of the Bridges et al. PSL is contrary to any proper interpretation. While a particular system listed in the PSL may not be used at any given moment, that same system is not precluded from being used at some other time by the mobile station in Bridges et al. In contrast, the at least one

network identifier in the second list that is not to be used is designated to never be used by the mobile station. Therefore, the Bridges et al. list of preferred system identifiers does not anticipate Applicant's at least one network identifier in the second list being an identifier of a network that is not to be used.

In the description above, Bridges et al. neither discloses nor suggests, the "means for receiving a message that includes a first list including a plurality of network identifiers that are available for a potential handover, from the communication network" as recited in Claim 29.

Also Delay neither discloses nor suggests, the "means for receiving a message that includes a first list including a plurality of network identifiers that are available for a potential handover, from the communication network" mentioned in claim 29 of this invention.

Therefore, for at least the reasons provided above, Claims 28, 29 and 32 are believed to be allowable over the cited prior art.

## CONCLUSION

In view of the foregoing remarks, it is respectfully submitted that all claims presently pending in the application, namely, Claims 28, 29 and 32 are in condition for allowance and patentably distinguishable over the art of record.

Respectfully submitted,



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